



Preface

Permit writers have an arduous task. They must be intimately familiar with hundreds of sections of detailed regulations, have a working knowledge of dozens of highly technical and scientific subjects, have expert and prolific communication and writing skills, and be a departmental diplomat to other state and federal agencies, local governments, California industry, and community and environmental action groups. At the same time, the number of printed pages of hazardous waste laws, regulations and technical guidance continues to expand nearly geometrically every year, as it has since the mid 1970's, totally confounding the permit writer's ability achieve even a modest command of required knowledge, let alone a desired level of personal and professional excellence.

These instructions are an attempt to simplify and organize some of the diverse bits and pieces of information a permit writer must apply, on a topic-by-topic, section-by-section basis, while reviewing a permit application. They follow work that began in 1988, when permitting seniors worked at various offsite locations to write down, in outline format, all of the various steps and documents a permit writer must complete to process a storage and treatment permit application. The results of the early work were used in 1990 and 1991 to train new permitting employees. Desiring to not add to the crush of printed material a permit writer must read and understand, brevity is the adopted standard for each chapter.

To aid the organization of information issued from dozens of sources, and to reduce the amount of work required to prepare the entire document, most chapters follow a standardized outline format. Since not every standardized outline topic applies to each chapter, the reader will find many chapters have outline topics that are left blank. These topics have been deliberately left blank in the current version to help stimulate thinking and consideration about whether there is additional information that should be added during future updates. If it is eventually determined that a particular topic will never likely apply to a particular chapter, the topic may be easily deleted.

It is envisioned that the document will be reviewed and updated by permitting seniors on an annual basis, adding new statutes, regulations, policies, and technical guidance as they emerge. Permit writers (who are the presumed direct users of the document) are encouraged to provide user comments to their seniors on a continuous basis. Such feedback is important in order for the document to eventually provide maximum utility to all users.

Experienced permit writers are especially encouraged to report whether the document provides any real simplification and organization of permitting work. If not, the document is moot and must be reworked into something that will be a true resource to all permitting staff. Similarly, new permit writers are asked to report whether the document provides the level of organization and instruction needed to quickly understand the various tasks and details involved in processing a permit application. If a point is found to be confusing or missing altogether, it should be reported to the senior so that the problem can be corrected during the next update cycle. The authors will be grateful for everyone's contribution toward making the document a success.

The current document is the collective effort of many of the Department of Toxic Substances Control (DTSC) employees. A special thanks to all those who helped with this latest edition.

NOTE: The cost of this manual for non-DTSC staff is \$145.00¹. For purchase, please send your check to DTSC, Accounting Unit, P.O. Box 806, Sacramento, California 95812. Also, non-DTSC staff can purchase the "Permit Writer Instructions for **Closure** of Storage and Treatment Facility" for \$45.00 (see Appendix B for the order form). If you have any questions or comments regarding this manual or closure manual, please contact **Hossein Nassiri** at (916) 327-4493 or mail your comments to DTSC, Permitting Division, P.O. Box 806 - HQ 10, Sacramento, California, 95812.

¹ This includes shipping and handling. Also you will receive the next two revisions of this manual free, when they become available.